

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	Case No. 22-10571
	)	
Matthew M. Motil,	)	Chapter 7
	)	
Debtor.	)	Judge Arthur I. Harris
	)	

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**NOTICE OF DEBTOR'S AMENDED SCHEDULE A/B**

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Now comes the Debtor, Matthew M. Motil, by and through his undersigned counsel, and files the attached Amended Schedule A/B. Schedule A/B is being amended to add three items of personal property to the Debtor's Schedule of Assets. These items are a Rolex watch, which was inadvertently left off of the original Schedule A/B as a result of an error made by counsel, which was fully disclosed to the Case Trustee at the 341 Meeting. The watch was subsequently surrendered to the Case Trustee, and has been sold for the amount of \$9,000.

The Schedule is also being amended to add two non-operating limited liability companies (each valued at \$0.00) created by the Debtor: Dope Ideas, LLC and North Shore Ecom, LLC, which were inadvertently omitted from the original Schedules.

Respectfully submitted,

/s/Thomas W. Coffey  
Thomas W. Coffey (0046877)  
Coffey Law LLC  
2430 Tremont Avenue  
Cleveland, OH 44113  
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*Counsel for the Debtor*

### **CERTIFICATE OF SERVICE**

I hereby certify that this Notice of Amended Schedule AB was served on Scott R. Belhorn, Trial Attorney for the U.S. Trustee, and Virgil Brown, Case Trustee, as well as all other parties receiving electronic notice in this case, via the Court's electronic filing system on December 16, 2022.

/s/Thomas W. Coffey  
Thomas W. Coffey (0046877)

**Fill in this information to identify your case and this filing:**

Debtor 1 **Matthew M. Motil**  
First Name Middle Name Last Name

Debtor 2  
(Spouse, if filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: **NORTHERN DISTRICT OF OHIO**

Case number **22-10571**

☐ Check if this is an amended filing

**Official Form 106A/B****Schedule A/B: Property****12/15**

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

**Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In**

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

- ☒ No. Go to Part 2.
- ☐ Yes. Where is the property?

**Part 2: Describe Your Vehicles**

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycles

- ☒ No
- ☐ Yes

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories

Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

- ☒ No
- ☐ Yes

5 Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here.....=>

**\$0.00****Part 3: Describe Your Personal and Household Items**

Do you own or have any legal or equitable interest in any of the following items?

**Current value of the portion you own?**  
Do not deduct secured claims or exemptions.

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

- ☐ No
- ☒ Yes. Describe.....

Debtor's interest in household goods and furnishings owned jointly with non-filing spouse.

**\$11,000.00**

**7. Electronics**

*Examples:* Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

☐ No☒ Yes. Describe.....**Personal computers, telephones, and related equipment****Unknown****8. Collectibles of value**

*Examples:* Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

☒ No☐ Yes. Describe.....**9. Equipment for sports and hobbies**

*Examples:* Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

☒ No☐ Yes. Describe.....**10. Firearms**

*Examples:* Pistols, rifles, shotguns, ammunition, and related equipment

☐ No☒ Yes. Describe.....**Three Nine mm pistols: Taurus PT 1911 (\$250.00); Glock 19 (\$350.00); Smith & Wesson M&P (\$300.00)****\$900.00****11. Clothes**

*Examples:* Everyday clothes, furs, leather coats, designer wear, shoes, accessories

☐ No☒ Yes. Describe.....**Ordinary men's clothing****Unknown****12. Jewelry**

*Examples:* Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

☐ No☒ Yes. Describe.....**Wedding ring and other jewelry****Unknown****Rolex Watch****\$9,000.00****13. Non-farm animals**

*Examples:* Dogs, cats, birds, horses

☐ No☒ Yes. Describe.....**Dog, mixed breed****\$100.00****14. Any other personal and household items you did not already list, including any health aids you did not list**☐ No☒ Yes. Give specific information.....**Personal and household items owned by Debtor****Unknown**

15. Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here .....

\$21,000.00**Part 4: Describe Your Financial Assets**

Do you own or have any legal or equitable interest in any of the following?

**Current value of the portion you own?**  
Do not deduct secured claims or exemptions.

**16. Cash**

*Examples:* Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

☐ No☒ Yes.....**Cash**\$500.00**17. Deposits of money**

*Examples:* Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.

☐ No☒ Yes.....

Institution name:

17.1. **Checking**Chase BankUnknown17.2. **Savings**Chase BankUnknown**18. Bonds, mutual funds, or publicly traded stocks**

*Examples:* Bond funds, investment accounts with brokerage firms, money market accounts

☒ No☐ Yes.....

Institution or issuer name:

**19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture**☐ No☒ Yes. Give specific information about them.....

Name of entity:

% of ownership:

ALV Cleveland, LLC100 %\$0.00NS Equity Cleveland, LLC100 %\$0.00North Shore Equity Sales, LLC100 %\$0.00BUYCLE 158, LLC100 %\$0.00BUYCLE 175, LLC100 %\$0.00BUYCLE 176, LLC100 %\$0.00INVCLE150, LLC100 %\$0.00

<u>NSEM Management 1, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>NSEM Mansfield 2, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>Motil Capital, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>Alpha Legend Ventures, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>Trinity Capiyal Management, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>Alpha Thread Worx, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>3rd Party Management, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>CLE Bros Coffee, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>ALV Twinsburg, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>BUY CLE 100, LLC</u>	<u>100</u>	<u>%</u>	<u>\$0.00</u>
<u>DREMCUBED, LLC</u>	<u>50</u>	<u>%</u>	<u>Unknown</u>
<u>AXC Cleveland, LLC</u>	<u>50</u>	<u>%</u>	<u>\$0.00</u>
<u>AXC Twinsburg, LLC</u>	<u>50</u>	<u>%</u>	<u>\$0.00</u>
<u>Dope Ideas, LLC</u>	<u>100%</u>	<u>%</u>	<u>\$0.00</u>
<u>North Shore Ecom, LLC</u>	<u>100%</u>	<u>%</u>	<u>\$0.00</u>

20. **Government and corporate bonds and other negotiable and non-negotiable instruments***Negotiable instruments* include personal checks, cashiers' checks, promissory notes, and money orders.*Non-negotiable instruments* are those you cannot transfer to someone by signing or delivering them.☒ No☐ Yes. Give specific information about them

Issuer name:

21. **Retirement or pension accounts***Examples:* Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans☒ No☐ Yes. List each account separately.

Type of account:

Institution name:

22. **Security deposits and prepayments**

Your share of all unused deposits you have made so that you may continue service or use from a company

*Examples:* Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others☒ No☐ Yes. ....

Institution name or individual:

**23. Annuities** (A contract for a periodic payment of money to you, either for life or for a number of years)☒ No☐ Yes..... Issuer name and description.**24. Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.**

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

☒ No☐ Yes..... Institution name and description. Separately file the records of any interests. 11 U.S.C. § 521(c):**25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit**☒ No☐ Yes. Give specific information about them...**26. Patents, copyrights, trademarks, trade secrets, and other intellectual property***Examples:* Internet domain names, websites, proceeds from royalties and licensing agreements☐ No☒ Yes. Give specific information about them...

**Patent for Nutraceutical Formulation for Unblocking Receptors.**  
Patent has been, or may have been, assigned to DREMCUBED, LLC. Patent is registered in the names of Debtor's non-filing spouse and Debtor. Ownership of DREMCUBED LLC is also 50-50 Debtor and Debtor's non-filing spouse. Filing for Patent was June, 2019. There is, to-date, no viable product or manufacturing capability associated with the patent.

**Unknown****27. Licenses, franchises, and other general intangibles***Examples:* Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses☒ No☐ Yes. Give specific information about them...**Money or property owed to you?****Current value of the portion you own?**  
Do not deduct secured claims or exemptions.**28. Tax refunds owed to you**☒ No☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....**29. Family support***Examples:* Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement☒ No☐ Yes. Give specific information.....**30. Other amounts someone owes you***Examples:* Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else☒ No☐ Yes. Give specific information..**31. Interests in insurance policies***Examples:* Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance☒ No☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund value:

**32. Any interest in property that is due you from someone who has died**

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

- ☒ No  
☐ Yes. Give specific information..

**33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment**

*Examples: Accidents, employment disputes, insurance claims, or rights to sue*

- ☐ No  
☒ Yes. Describe each claim.....

<b>Legal Malpractice Claim against Cavitch Familo &amp; Durkin</b>
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<b>\$200,000.00</b>
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<b>Breach of Contract claim against Ryan Stewman adn Break Free Academy</b>
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<b>\$25,000.00</b>
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**34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims**

- ☐ No  
☒ Yes. Describe each claim.....

<b>Counterclaim against Geoff DelGrosso based on conversion of Alpha Thread Worx, LLC assets</b>
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<b>\$40,000.00</b>
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**35. Any financial assets you did not already list**

- ☒ No  
☐ Yes. Give specific information..

**36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....**

<b>\$265,500.00</b>
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**Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.****37. Do you own or have any legal or equitable interest in any business-related property?**

- ☒ No. Go to Part 6.  
☐ Yes. Go to line 38.

**Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.**

If you own or have an interest in farmland, list it in Part 1.

**46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?**

- ☒ No. Go to Part 7.  
☐ Yes. Go to line 47.

**Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above****53. Do you have other property of any kind you did not already list?**

*Examples: Season tickets, country club membership*

- ☒ No  
☐ Yes. Give specific information.....

**54. Add the dollar value of all of your entries from Part 7. Write that number here .....**

<b>\$0.00</b>
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Debtor 1 Matthew M. Motil

Case number (if known) 22-10571

**Part 8:** List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2 .....			<u>\$0.00</u>
56. Part 2: Total vehicles, line 5		<u>\$0.00</u>	
57. Part 3: Total personal and household items, line 15		<u>\$21,000.00</u>	
58. Part 4: Total financial assets, line 36		<u>\$265,500.00</u>	
59. Part 5: Total business-related property, line 45		<u>\$0.00</u>	
60. Part 6: Total farm- and fishing-related property, line 52		<u>\$0.00</u>	
61. Part 7: Total other property not listed, line 54	+	<u>\$0.00</u>	
62. Total personal property. Add lines 56 through 61...		<u>\$286,500.00</u>	Copy personal property total <u>\$286,500.00</u>
63. Total of all property on Schedule A/B. Add line 55 + line 62			<div><u>\$286,500.00</u></div>

Fill in this information to identify your case:

Debtor 1 **Matthew M. Motil**  
First Name Middle Name Last Name

Debtor 2  
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: NORTHERN DISTRICT OF OHIO

Case number **22-10571**  
(if known)

☐ Check if this is an amended filing

Official Form 106Dec

**Declaration About an Individual Debtor's Schedules**

12/16

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

☒ No

☐ Yes. Name of person \_\_\_\_\_

Attach Bankruptcy Petition Preparer's Notice, Declaration, and Signature (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

X   
Matthew M. Motil  
Signature of Debtor 1

X \_\_\_\_\_  
Signature of Debtor 2

Date **December 15, 2022**

Date \_\_\_\_\_